

Message

From: McNeal, Dave [Mcneal.Dave@epa.gov]
Sent: 7/30/2019 1:33:10 PM
To: Taylor, Sean [Sean.Taylor@dnr.ga.gov]
CC: Taylor, Kevin [Taylor.Kevin@epa.gov]; Arias, Megan [arias.megan@epa.gov]
Subject: Kinder Morgan
Attachments: Thomaston_EPA-OOOOa-RecordsRequest_20190710_Final.pdf

Sean,

I wanted to let you know that I am working on the attached NSPS Subpart OOOOa applicability determination request from Kinder Morgan. The company sent this request to us because the GA EPD has not adopted Subpart OOOOa yet.

Kinder Morgan's basic question is whether a mainline valve (MLV) located at the company's Thomaston Compressor Station is subject to the leak detection and repair requirements (LDR) in Subpart OOOOa.

I have talked to two EPA Headquarters' offices (Office of Compliance and the Office of Air Quality Planning and Standards), and the consensus is that the MLV is subject to the LDR requirements in Subpart OOOOa.

I am drafting a response to Kinder Morgan's request and plan to send it to EPA Headquarters for review late this week.

If you have any questions, let me know.

David McNeal
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